

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MONICA PERRYMAN,)	
)	
Plaintiff,)	
)	2:06-cv-216-mef
V.)	
)	
FIRST UNITED METHODIST)	
CHURCH and DARLENE MAYE,)	
)	
Defendants.)	
)	

DEFENDANTS' WITNESS LIST

COME NOW the Defendants First United Methodist Church and Darlene Maye and identify the flowing witnesses that may be called at the trial of this matter:

I. THE DEFENDANTS EXPECT TO CALL:

1. Monica Perryman;
2. Darlene Maye, 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
3. Phillip Saunders, 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;

II. THE DEFENDANTS MAY CALL:

4. Teresa Davis, 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
5. Heather Ennis, 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
6. Sadye Givens; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
7. Demetria Pollard; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
8. Gwenda Sneed; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;

9. Sherkitna Stovall; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
10. Gina Thomas; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
11. Mary Wiggins; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
12. Lomar Benson; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
13. An individual identified by Plaintiff as "Miss Mary;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
14. An individual identified by Plaintiff as "Miss Heather;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
15. An individual identified by Plaintiff as "Miss Latoria" or "Ms. Latoria;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
16. An individual identified by Plaintiff as "Miss Pat;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
17. An individual identified by Plaintiff as "Miss Keitha;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
18. An individual identified by Plaintiff as "Miss Tora;" 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
19. William Graves, M.D.
20. Donna Martin; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
21. Evelyn Falcon; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;

22. Honey Williams; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
23. Virginia Williams, 2901 Fernway Dr. Montgomery, Alabama 36111 (334) 241-8360;
24. Glenda Argo, 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
25. Renee Snare; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
26. Burke Savage; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
27. Dr. Karl Stegall or any other representative of First United Methodist Church; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
28. Mary Dowdy; 2416 W. Cloverdale Park, Montgomery, Alabama 36106, (334) 834-8990;
29. Nina Kelly, 568 Dunbarton Dr., Montgomery, Alabama 36117, (334) 279-7880;
30. All other physicians, nurses, nurses' assistants, therapists, technicians, or other health care providers or hospital personnel of any description who were involved in the care of Monica Perryman;
31. All other healthcare providers who provided any diagnostic evaluation to Monica Perryman.
32. A representative of ALFA Childcare Center;
33. Pat Mann, or any appropriate representative of National Industry;
30. Any representative of Plaintiff's former employers yet to be discovered or deposed;
34. Any witness whose identity or relevant knowledge are identified through subsequent discovery;
35. Any expert witness identified by this Defendant, or by any other party;
36. Any records custodian or other person whose testimony is necessary for the introduction into evidence of any document, including but not limited to any medical record, hospital record, physicians' record or report, ambulance or EMT record, or any other document offered as an exhibit by this Defendant;
37. Any witness who has been or will be deposed prior to trial;
38. Any witness who is listed in any party's interrogatory responses or in any documents

exchanged in discovery in this matter;

39. All persons who are identified or mentioned in any deposition which has been or will be taken in this matter;
40. Any rebuttal or impeachment witness; and
41. The Defendant reserves the right to supplement this list as discovery is completed or as justice requires.

Respectfully submitted this the 16th day of January, 2007.

s/Robert A. Huffaker (HUF003)
s/Alan T. Hargrove (HAR236)
s/R. Brett Garrett (GAR085)
**RUSHTON, STAKELY, JOHNSTON
& GARRETT, P.A.**
184 Commerce Street
Post Office Box 270
Montgomery, Alabama 36101-0270
Tel: (334) 206-3215
Fax: (334) 262-6277

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon:

Norman Hurst, Jr.
462-A Sayre Street
Montgomery, AL 36104

by placing same in the United States Mail, postage prepaid and properly addressed on this the 16th day of January, 2007.

s/R. Brett Garrett (GAR085)